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CORRECTION CONTROL
OUTGOING LTR NO

DOE ORDER #

93 RF 13351

EG&G ROCKY FLATSEG&G ROCKY FLATS, INC
ROCKY FLATS PLANT, P O BOX 464, GOLDEN, COLORADO 80402 0464 • (303) 966-7000

DIST	LTR	ENC
AMARAL M E		
BENEDETTI R L	X	X
BENJAMIN, A		
BERMAN H'S		
BRANCH D B		
CARNIVAL G J		
CHURCH A A	X	X
COPP, R D		
DAVIS, J G		
FERRERA, D W		
G-FROST, L A	X	X
HANNI, B J		
HARMAN, L K		
HEALY, T J		
HEDAH, T G	X	X
HILBIG, J G		
KIRBY, W A		
KUESTER A W		
MAHAFFEY, J W		
MANN H P		
MARTINEZ A	X	X
MARX, G E		
MCDONALD M M		
MCKENNA F G		
MONTROSE, J K		
MORGAN, R V	X	X
PETER K G	X	X
PIZZUTO V M		X
POTTER G L		
RISING T L	X	X
SANDLIN, N B		
SCHUBERT A L	X	X
SETLOCK, G H	X	X
STEWART D L		X
SULLIVAN M T		
SWANSON E R		
WILKINSON, R B		
WILLIAMS S		
WILSON J M		
WYANT R D		
ZARRET, J	X	X
Freehling M T	X	X
Broussard, M C	X	X
Myrsk, S L	X	X

PATS X
CORRECTION CTRL XCLASSIFICATION
UCNI
UNCLASSIFIED X X
CONFIDENTIAL
SECRETAUTHORIZED CLASSIFIER
SIGNATUREDATE
10-27-93

IN REPLY TO RFP CC NO

ACTION ITEM STATUS

☐ Partial/Open
☒ Closed

LTR APPROVALS

ORIG & TYPIST INITIALS

RF-46469 (Rev 9/93)

HPM-687-93

November 1, 1993

Mark N Silverman
Manager
DOE, RFO

Attn D L Mauer

REQUEST FOR CHANGES FOR RESOURCE CONSERVATION AND RECOVERY
ACT (RCRA) UNITS THAT SUPPORT ENVIRONMENTAL RESTORATION
ACTIVITIES, REVISION 14 TO THE PART A APPLICATION.- HPM-687-93

Enclosed is a draft letter to the Colorado Department of Health (CDH) requesting a change to interim status for units that support environmental restoration activities. These changes are being requested pursuant to Part 100, §100 20(b)(4) of 6 CCR 1007-3. Specifically, the requested changes are

- (1) The withdrawal of the Remedial Action Decontamination Pad (RADP) tanks (RCRA Unit 18 01) from interim status,
- (2) Additional waste codes for interim status RCRA Units 18 03 (Tent 1) and 18 04 (Container storage area near the RADP),

Additionally, included is a clarification of the facility that comprises Unit 18 03

Through chemical analysis and recent CDH guidance, EG&G Rocky Flats, Inc has determined that the waste water generated from the decontamination activities at the RADP (Unit 18 01) is not hazardous waste. Since the decontamination waste water is not a hazardous waste, RCRA regulation of the RADP is not necessary. Included in the enclosed draft letter to CDH is the request for the removal from interim status for Unit 18 01 and a revised Part A Application with Unit 18 01 deleted. This request for deletion of Unit 18 01 also completes Task 12 of the Action Plan for Decontamination Facility, Finding #93-WM-OOS-891-005-003

The additional waste codes requested for Units 18 03 (Tent 1) and 18 04 (Container Storage Area near the RADP) are required to store hazardous waste and Investigation Derived Material (IDM) generated from Operable Unit (OU) 4, OU 5 and other corrective action activities

The clarification for Unit 18 03 involves notifying CDH that cargo containers are also being used to store containers at Unit 18 03. The use of cargo containers does not affect the storage capacity at Unit 18 03



ADMIN RECORD

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

A SW 00101

Mark N Silverman
November 1, 1993
93-RF-13351
Page 2 of 2

A revised Part A Application reflecting the requested changes to interim status is enclosed.

If you have any questions regarding this letter, please contact Kyle Peter at extension 6345 or Mike Freehling at extension 8202



H. P. Mann
General Manager
EG&G Rocky Flats, Inc

MJF aaf

Orig and 1 cc - M N Silverman

Enclosures

- 1) Draft letter to CDH
- 2) Revised Part A Application Revision 14

DRAFT

DRAFT

DRAFT

Colorado Department of Health
Hazardous Materials and Waste Management Division
HMWMD-HWC-B2/Attn. G W Baughman, L Weers
4300 Cherry Creek Drive South
Denver, CO 80222-1530

**REQUEST FOR CHANGES FOR RESOURCE CONSERVATION AND RECOVERY
ACT (RCRA) UNITS THAT SUPPORT ENVIRONMENTAL RESTORATION ACTIVITIES,
REVISION 14 TO THE PART A APPLICATION**

The purpose of this letter is to request several changes to interim status for units that support environmental restoration activities. These changes are being requested pursuant to Part 100, §100 20(b)(4) of 6 CCR 1007-3. Specifically, the requested changes are

- (1) The withdrawal of the Remedial Action Decontamination Pad (RADP) tanks (RCRA Unit 18 01) from interim status,
- (2) Additional waste codes for interim status RCRA Units 18 03 (Tent 1) and 18 04 (Container storage area near the RADP),

Additionally, included is a clarification of the facility that comprises Unit 18 03

The United States Department of Energy (DOE) requests that RCRA Unit 18 01 (RADP Storage tanks) be removed from the Part A Application. The basis for this request is that the decontamination waste water generated at the RADP is not a hazardous waste. This determination is based on the guidance received from your department that the hazardous waste determination for the decontamination waste water should only be based on characteristics. The decontamination waste water tanks shall be emptied and rinsed to ensure that the material stored in the tanks while in interim status has been removed.

The additional waste codes requested for Units 18 03 (Tent 1) and 18 04 (Container Storage Area near the RADP) are required to store hazardous waste and Investigation Derived Material (IDM). These additional waste codes have been identified through hazardous waste characterizations performed by the hazardous waste generators. The additional waste codes requested for interim status are

<u>Waste Code</u>		<u>Source</u>
D002 (Corrosive)	-	Bentonite Drilling Mud
D010 (Selenium)	-	Decontamination Pad Sediment
D018 (Benzene)	-	Decontamination Pad Sediment
D027 (1,4-Dichlorobenzene)	-	ER Drum Repackaging
D028 (1,2-Dichlorobenzene)	-	ER Drum Repackaging
D029 (1,1-Dichloroethylene)	-	ER Drum Repackaging
D035 (Methyl ethylketone)	-	Operable Unit 5 IDM
D039 (Tetrachloroethylene)	-	Operable Unit 5 IDM
D040 (Trichloroethylene)	-	Operable Unit 5 IDM
D043 (Vinyl Chloride)	-	ER Drum Repackaging
F006	-	Operable Unit 4 IDM
F007	-	Operable Unit 4 IDM
F009	-	Operable Unit 4 IDM

A review of previous correspondence has revealed that the specific boundaries of interim status Unit 18 03 have not been clearly defined DOE interprets the interim status Unit 18 03 to include the cargo containers that are shown in the Unit 18 03 information sheet previously submitted as part of the State RCRA Permit Modification for Interim Units dated October 1992

A revised Part A Application reflecting the requested changes to interim status is enclosed

If you have any questions regarding this matter, please contact John Rampe at 966-6246 or Debbie Mauer at 966-5598

Enclosures

1) Revised Part A Application Revision 14

cc

D	L	Mauer	-	DOE, RFO
J		Rampe	-	DOE, RFO
K	G	Peter	-	EG&G Rocky Flats, Inc
A	L	Schubert	-	EG&G Rocky Flats, Inc